

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

A. PHILIP RANDOLPH INSTITUTE OF OHIO, et al.,

Plaintiffs,

v.

FRANK LAROSE, in his official capacity as Secretary  
of State of Ohio,

Defendant.

Case No. 1:20-cv-01908

Hon. Dan Aaron Polster

**PLAINTIFFS' MOTION FOR EXPEDITED BRIEFING SCHEDULE  
FOR MOTION FOR RECONSIDERATION**

Plaintiffs A. Philip Randolph Institute of Ohio, et al., (“Plaintiffs”) respectfully move that this U.S. District Court for the Northern District of Ohio (“Court”) order an expedited briefing schedule as to Plaintiffs’ Motion for Reconsideration of the of Opinion and Order Dismissing Case Without Prejudice. Dkt. No. 89. Plaintiffs propose that Defendant Frank LaRose, in his official capacity as Secretary of State for the State of Ohio, (“Defendant”) be required to file a response to Plaintiffs’ Motion for Reconsideration by 12:00 PM EST, Saturday, October 10, 2020, with Plaintiffs to file a reply by 12:00 PM EST, Sunday, October 11, 2020.

An expedited schedule is necessary because of constitutional concerns raised by Defendant’s August 12, 2020, Directive 2020-16, which have not been resolved. If not resolved in an expedited manner, Directive 2020-16 stands to negatively impact Ohio voters during the 2020 general election and during the early-voting period, which began on October 6, 2020.

The sooner county boards of elections know that they will be able to set up drop box locations beyond one per county located at or directly outside the offices of county boards of elections, fewer Ohioans will experience disenfranchisement as a result of Defendant's equal protection and other constitutional rights violations.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that their Motion for Order for Expedited Briefing Schedule be granted.

Dated: October 8, 2020

Respectfully submitted,

/s/ James Schuster

James Schuster (Ohio Bar No. 0065739)  
JSA LLP  
2355 Bellfield Ave.  
Cleveland Heights, OH 44106  
Telephone: (216) 882-9999  
jschuster@OHcounsel.com

Jon Greenbaum  
Ezra D. Rosenberg  
Pooja Chaudhuri  
LAWYERS' COMMITTEE FOR  
CIVIL RIGHTS UNDER LAW  
1500 K Street N.W., Suite 900  
Washington, D.C. 20005  
Telephone: (202) 662-8600  
jgreenbaum@lawyerscommittee.org  
erosenberg@lawyerscommittee.org  
pchaudhuri@lawyerscommittee.org

Subodh Chandra (Ohio Bar No. 0069233)  
Donald P. Screen (Ohio Bar No. 0044070)  
Brian D. Bardwell (Ohio Bar No. 0098423)  
THE CHANDRA LAW FIRM LLC  
1265 W. 6th St., Suite 400  
Cleveland, OH 44113-1326  
Telephone: (216) 578-1700  
Subodh.Chandra@ChandraLaw.com  
Donald.Screen@ChandraLaw.com  
Brian.Bardwell@ChandraLaw.com

Freda J. Levenson (Ohio Bar No. 0045916)  
ACLU OF OHIO FOUNDATION  
4506 Chester Avenue  
Cleveland, Ohio 44103  
Telephone: (216) 472-2220  
flevenson@acluohio.org

David J. Carey (Ohio Bar No. 0088787)  
ACLU OF OHIO FOUNDATION  
1108 City Park Avenue, Suite 203  
Columbus, Ohio 43206  
Telephone: (614) 586-1972 x2004  
dcarey@acluohio.org  
Neil A. Steiner  
Mariel R. Bronen  
DECHERT LLP  
Three Bryant Park  
1095 Avenue of the Americas  
New York, New York 10019  
Telephone: (212) 689-3500  
neil.steiner@dechert.com  
mariel.bronen@dechert.com

Erik Snapp  
DECHERT LLP  
35 West Wacker Drive, Suite 3400  
Chicago, IL 60601  
Telephone: (312) 646-5800  
erik.snapp@dechert.com

Lindsey B. Cohan  
DECHERT LLP  
515 Congress Avenue, Suite 1400  
Austin, Texas 78701  
Telephone: (512) 394-3000  
lindsey.cohan@dechert.com

Theodore E. Yale  
DECHART LLP  
Cira Centre, 2929 Arch Street  
Philadelphia, PA 19104  
Telephone: (215) 994-4000  
theodore.yale@dechert.com

*Counsel for Plaintiffs*

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**[PROPOSED] ORDER**

AND NOW, this \_\_\_\_ day of October, 2020, upon consideration of Plaintiffs' Motion for Order for Expedited Briefing Schedule, it is hereby ORDERED that the Plaintiffs' Motion is GRANTED. Defendant Frank LaRose, in his official capacity as Secretary of State for the State of Ohio, shall file any response to Plaintiff's Motion for Reconsideration by 12:00 PM EST, Saturday, October 10, 2020, and Plaintiffs shall file any reply in support by 12:00 PM EST, Sunday, October 11, 2020. IT IS SO ORDERED.

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Hon. Dan Aaron Polster  
United States District Judge

**CERTIFICATE OF SERVICE**

I CERTIFY that on October 8, 2020, a true and correct copy of the foregoing was furnished by electronic filing with the Clerk of the Court via CM/ECF, which will send notice of electronic filing to all counsel of record.

/James Schuster/  
James Schuster (Ohio Bar No. 0065739)  
JSA LLP  
2355 Bellfield Ave.  
Cleveland Heights, OH 44106  
Telephone: (216) 882-9999  
jschuster@OHcounsel.com